

COHEN & GREEN

February 14, 2022

Hon. Gabriel W. Gorenstein, U.S.M.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

**Re: In re: New York City Policing During Summer 2020 Demonstrations,
1:20-CV-8924 (CM) (GWG) — This Letter Relates to All Cases**

Dear Judge Gorenstein:

I write on behalf of the Plaintiffs in the consolidated case above. As discussed at the conference on Friday, provided with this letter is the prophylactic order I proposed in Court that (broadly described), translated into a proposed form.¹ I will also send a Word version of the proposed Order to the Court and Defendants' counsel by email, so Defendants can more easily propose any changes or make any objections in the next two business days, and so that the Court can make any changes it desires.

To flag the issue, as I said on Friday, we are proposing a presumed, escalating proposed sanction for all deadline violations going forward. We did that in ¶¶ 6-7, with the understanding that the specific amounts and so on may not be what the Court decides is appropriate or the correct structure.

As ever, we thank the Court for its continued time and attention.

Respectfully submitted,

/s/

J. Remy Green

Honorific/Pronouns: Mx., they/their/them

COHEN&GREEN P.L.L.C.

*Attorneys for Son, Minett, & Hernandez Plaintiffs,
on behalf of all Plaintiffs*

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cc:

All relevant parties by electronic filing.

¹ As also discussed, on Wednesday, we will email Chambers a draft order covering the various rulings the Court made on the record (outside of ECF Nos. 370, 374, and 386).